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RECEIVED

SEP 30 2003

OFFICE OF
THE CHIEF JUSTICE

September 24, 2003

Michigan Supreme Court
Law Center Building
P.O. Box 30052
Lansing, Michigan 48909



Re: Proposed Michigan Standards for Imposing Lawyer Sanctions
ADM file No 2002-29

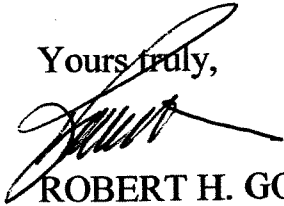
Honorable Justices of the Court,

I do not believe that every time we wish to impose rules on the practice that it is necessary to come up with a Michigan version of what some other jurisdiction or body has already done. I wish to voice our* objections to the imposition of separate Michigan Standards, briefly, on the following basis:

1. They are little different than the ABA Standards which could be adopted (as amended to avoid update).
2. They create a needless new body of rules that will undoubtedly have to be interpreted, which will give counsel an avenue of appeal not needed since the ABA rules have been interpreted by most courts with a long body of case law.
(I am under the impression that the very old Michigan Court Rules were modeled after the federal rules but became so outdated that a new body of rules have to be created from time to time.)
3. They will substantially increase the work load of the Attorney Discipline Board in interpreting this new body of rules and will increase the number of Applications for Leave to Appeal to your court.

4. A simple administrative order from this court adopting the ABA Rules on Attorney Discipline will bring the rules into permanent use from interim or temporary use and no new body of rules needs to be invented.

Yours truly,

A handwritten signature in black ink, appearing to read 'R. Golden', with a stylized flourish extending from the end.

ROBERT H. GOLDEN

* Golden and Kunz, P.C. was formed in 1978 and has aggressively and regularly represented Lawyers before the Attorney Discipline Board since formation. Armand Kunz is a former General Counsel to the Michigan State Bar and a former Grievance Administrator.